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8 Attorneys for Plaintiff  
9 ALL POINTS CAPITAL CORP., a New York  
10 corporation

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ALL POINTS CAPITAL CORP., a New  
York corporation,

Plaintiff,

v.

ARCHITECTURAL METAL PRODUCTS,  
INC., an Alaska corporation; PACIFIC  
ROLLFORMING, LLC, an Alaska limited  
liability company; RIDGETOP HAWAII,  
INC., an Hawaiian corporation; RIDGETOP  
ROOFING AND GUTTER, INC., an Alaska  
corporation; ROBERT OLLMAN, a citizen  
of the State of Wisconsin; BORIS  
GOKHMAN, a citizen of the State of  
Wisconsin; VLADIMIR SHUK, a citizen of  
the State of Wisconsin; and TODD  
BEASLEY, a citizen of the State of Alaska,

Defendants.

Case No. C 08-04394 VRW

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE THE CASE  
MANAGEMENT CONFERENCE**

**CURRENT Case Management Conference:**

Date: January 8, 2009  
Time: 3:30 P.M.  
Place: Courtroom 6  
17<sup>th</sup> Floor  
United States District Courthouse  
450 Golden Gate Ave.  
San Francisco, California

**PROPOSED Case Management Conference:**

Date: ~~March 12, 2009~~ - March 19, 2009

1           WHEREAS Plaintiff All Points Capital Corp., a New York corporation ("Plaintiff"), is  
 2 represented by Arent Fox LLP, by attorneys in the New York and Los Angeles offices of the  
 3 firm;

4           WHEREAS Defendants Architectural Metal Products, Inc., an Alaska corporation, Pacific  
 5 Rollforming, LLC, an Alaska limited liability company, Ridgetop Hawaii, Inc., an Hawaiian  
 6 corporation, Ridgetop Roofing and Gutter, Inc., an Alaska corporation, and Todd Beasley, a  
 7 citizen of the State of Alaska (sometimes collectively referred to herein as the "Beasley  
 8 Defendants") are represented by Frederick Phillips, an attorney whose office is in San Diego,  
 9 California,

10           WHEREAS Defendant Boris Gokhman, a citizen of the State of Wisconsin is appearing  
 11 *Pro Se* in this action ("Defendant Gokhman"),

12           WHEREAS Defendant Vladimir Shuk, a citizen of the State of Wisconsin is also  
 13 appearing *Pro Se.* in this action ("Defendant Shuk"); and

14           WHEREAS the parties are attempting to negotiate a stipulated judgment, all of the parties  
 15 have expressed a willingness to resolve this dispute by a stipulated judgment, and the parties  
 16 desire additional time for their negotiations to proceed without the added expense of traveling to  
 17 San Francisco for the joint case management conference currently set for January 8, 2009;

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2           NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the  
 3 Court, the case management conference shall be continued for approximately sixty days until  
 4 March 12, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date  
 5 and time as may be convenient for the Court.

6           Dated: December 29, 2008

7           Arent Fox LLP

8           By: /s/

9           DAVID G. BAYLES

10           Attorneys for Plaintiff

11           ALL POINTS CAPITAL CORP.

12           Dated: December 29, 2008

13           By: /s/14           FREDERICK PHILLIPS, on behalf of  
 15           Architectural Metal Products,  
 16           Rollforming, LLC, Ridgetop Hawaii, Inc.,  
 17           Ridgetop Roofing and Gutter, Inc., and  
 18           Todd Beasley

19           Dated: December 29, 2008

20           By: /s/21           BORIS GOKHMAN, *Pro Se*

22           Dated: December 29, 2008

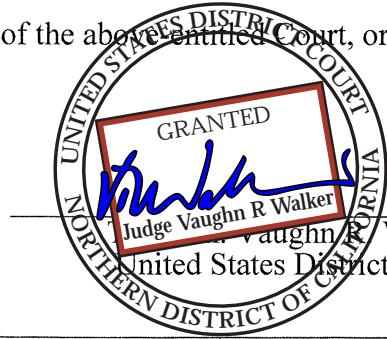
23           By: /s/24           VLADIMIR SHUK, *Pro Se*

25           **PROPOSED ORDER**

26           Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing  
 27 therefore, the case management conference in the above-referenced action currently set for  
 28 January 8, 2009, is hereby continued until March 12, 2009, at 3:30 p.m. or  
 \_\_\_\_\_ in Courtroom 6 of the above-entitled Court, or.

29           IT IS SO ORDERED.

30           Dated 12/30/2008



ALL POINTS CAPITAL v. ARCHITECTURAL METAL PRODUCTS  
CASE NO.: C 08-04394 VRW  
USDC, NORTHERN DISTRICT, SAN FRANCISCO  
PROOF OF SERVICE

I am a citizen of the United States. My business address is ARENT FOX LLP, 555 West Fifth Street, 48<sup>th</sup> Floor, Los Angeles, CA 90013. I am employed in the county of Los Angeles where this service occurs. I am over the age of 18 years, and not a party to the within cause.

On December 29, 2008 I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all parties appearing on the docket sheet:

**Stipulation and [Proposed] Order to Continue The Case Management Conference**

(BY FAX) by transmitting via facsimile from facsimile number (213) 629-7401 the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m. A statement that this document was successfully transmitted without error is hereby attached to this Proof of Service.

**X** **(BY MAIL)** I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business. On this date, I placed the document(s) in envelopes addressed to the person(s) listed below, or as stated on the attached service list and sealed and placed the envelopes for collection and mailing following ordinary business practices.

(BY PERSONAL SERVICE) On this date, I delivered by hand envelope(s) containing the document(s) to the persons(s) listed below or as stated in the attached service list.

(BY OVERNIGHT DELIVERY) On this date, I placed the documents in envelope(s) addressed to the person(s) listed below or as stated on the attached service list, and caused those envelopes to be delivered to an overnight delivery carrier, with delivery fees provided for, for next-business-day delivery to whom it is to be served.

(BY ECF) I caused said documents to be transmitted using the Court's ECF system.

**SEE ATTACHED SERVICE LIST**

X (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under the penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on December 29, 2008, at Los Angeles, California

Barbara Anderson  
Barbara Anderson

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2 Frederick C. Phillips, Esq.  
 3 Phillips, Haskett & Ingwalson  
 4 701 "B" Street, Suite 1190  
 San Diego, CA 92101  
 Tel.: (619) 231-3737  
 Fax: (619) 233-1223

5 Via ECF

6 Vladimir Shuk in Pro Per  
 7 New Land  
 1840 North Farwell Avenue, #203  
 Milwaukee, WI 53202  
**Via U. S. Mail**

8 Boris Gokhman in Pro Per  
 9 New Land  
 10 1840 North Farwell Avenue, #203  
 Milwaukee, WI 53202  
**Via U.S. Mail**

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